FEDERAL PUBLIC DEFENDER
DISTRICT OF NEW JERSEY
K. ANTHONY THOMAS, INTERIM FEDERAL PUBLIC DEFENDER
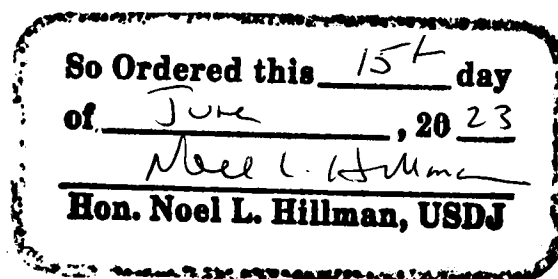
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June 8, 2023

***Via* ELECTRONIC FILING**
Hon. Noel L. Hillman, U.S.D.J.
United States District Court, D. N.J.
1 John F. Gerry Plaza,
Rm. 6020 Camden, NJ
08101-2797

So Ordered this _15th_ day
of _June_ , 20 23
Noel L. Hillman
Hon. Noel L. Hillman, USDJ

<div align="center">

Re: United States v. Mack Jones
<u>Docket No. 1-06-cr-76-NLH-6</u>

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Dear Judge Hillman:

Pursuant to Your Honor's scheduling order dated, (ECF 476), Mack Jones's submission addressing the effect of *Concepcion v. United States*, 142 S. Ct. 2389 (2022), and all remaining issues on his motion for a sentence reduction pursuant to the First Step Act was due to be filed 30 days after disclosure of an updated Presentence Investigation Report ("PSR"). The updated PSR was disclosed on May 9, 2023.

Undersigned counsel respectfully requests an extension until and including July 7, 2023 in which to file the supplemental submission on behalf of Mr. Jones. The United States, through Assistant United States Attorney Diana Carrig has no objection to this request, which is made due to other workload and scheduling demands, including but not limited to preparation for appellate

argument in the United States Court of Appeals for the Third Circuit.

If the request is granted, the briefing schedule would be as follows:

1. Counsel for Mr. Jones shall have until on or before July 7, 2023 to file a supplemental submission addressing all outstanding issues;

2. The government shall have three weeks after the filing of Mr. Jones's brief to file a response; and

3. Counsel for Mr. Jones shall have two weeks after the filing of the government's response to file a reply.

Counsel thanks the government and Probation for its position on this request and the Court's consideration of the request.

Respectfully submitted,

/ *Louise Arkel*
Louise Arkel
Assistant Federal Public Defender

cc.   Diana Carrig, AUSA (via electronic filing)